

Margaret A. McLetchie (NV Bar No. 10931)
Email: maggie@nvlitigation.com; efile@nvlitigation.com
Leo S. Wolpert (NV Bar No. 12658)
Email: leo@nvlitigation.com
McLetchie Law
602 S. 10th St.
Las Vegas, NV 89101
Telephone: 702-728-5300
Local Counsel for Defendant AJP Educational Foundation, Inc.

Christina A. Jump (LR IA 11-2 petition forthcoming)
Email: cjump@clcma.org
Samira S. Elhosary (LR IA 11-2 petition forthcoming)
Email: selhosary@clcma.org
Constitutional Law Center for Muslims in America*
100 N. Central Expy, STE 1010
Richardson, Texas 75080
Telephone: 972-915-2507
Attorneys for Defendant AJP Educational Foundation, Inc.

**The Constitutional Law Center for Muslims in America
is the legal division of the Muslim Legal Fund of America.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CORY GERWASKI,

Plaintiff,

v.

STATE OF NEVADA, ex rel. BOARD
OF REGENTS of the NEVADA
SYSTEM OF HIGHER EDUCATION,
on behalf of the UNIVERSITY OF
NEVADA, LAS VEGAS; KEITH
WHITFIELD, individually; AJP
EDUCATIONAL FOUNDATION INC.,
a California Non-Profit Corporation;
STUDENTS FOR JUSTICE OF
PALESTINE-UNLV; NATIONAL
STUDENTS FOR JUSTICE OF
PALESTINE; NEVADANS FOR
PALESTINIAN LIBERATION;
DOES I-XX and ROE entities I-XX,

Defendants.

Case No. 2:24-cv-00985-APG-MDC

**UNOPPOSED MOTION TO EXTEND
DEADLINE TO FILE RESPONSIVE
PLEADING**

(First Request)

1 Defendant AJP Educational Foundation, Inc. d/b/a American Muslims for Palestine (“AMP”)
2 hereby files this Unopposed Motion to Extend the deadline for it to file a responsive pleading in this
3 matter by two weeks, up to and including October 8, 2024. The present deadline for Defendant AMP to
4 file a responsive pleading is September 24, 2024. This is Defendant AMP’s first request to extend its time
5 to file responsive a pleading. Defendant AMP submits that good cause exists to grant this unopposed
6 request. Defendant AMP makes this request in accordance with LR IA 6-1 and 6-2 of the Local Rules of
7 this Court.

8 1. Plaintiff filed the instant case on May 26, 2024. ECF No. 1. Plaintiff filed his First
9 Amended Complaint on August 9, 2024. ECF No. 6.

10 2. Plaintiff served Defendant AMP with the Summons and First Amended Complaint on
11 September 3, 2024. ECF No. 10.

12 3. Pursuant to Fed. R. Civ. P. 12(a)(1)(A), Defendant AMP’s responsive pleading is due
13 September 24, 2024.

14 4. Ms. Christina Jump has represented AMP in separate federal civil litigation for seven
15 years and is based in Texas. Ms. Jump began searching in earnest for local counsel to support this
16 litigation pursuant to LR IA 11-2.

17 5. Ms. Jump and co-counsel Ms. Samira Elhosary will comply with LR IA 11-2 within 14
18 days of this Motion.

19 6. Ms. Jump contacted Plaintiff’s counsel via email requesting consent for a two-week
20 extension to Defendant AMP’s deadline to respond.

21 7. Plaintiff’s counsel agreed to this extension. Exhibit A at 1.

22 8. Defendant seeks this extension in part because it only recently secured local counsel for
23 this matter, in accordance with this Court’s Local Rules.

24 9. The First Amended Complaint in this matter constitutes 393 paragraphs. Therefore,
25 Defendant requires additional time to prepare its response after retaining local counsel.

26 10. This request is submitted in good faith and not for purposes of delay.

27 Accordingly, Defendant AMP respectfully requests this Court extend the time for it to file a
28 responsive pleading by fourteen days.

Respectfully submitted,

Dated: September 24, 2024

/s/ Margaret A. McLetchie

Margaret A. McLetchie (NV Bar No. 10931)

Email: maggie@nvlitigation.com; efile@nvlitigation.com

Leo S. Wolpert (NV Bar No. 12658)

Email: leo@nvlitigation.com

McLetchie Law

602 S. 10th St.

Las Vegas, NV 89101

Telephone: 702-728-5300

*Local Counsel for Defendant AJP Educational
Foundation, Inc.*

Christina A. Jump (LR IA 11-2 petition forthcoming)

Samira Elhosary (LR IA 11-2 petition forthcoming)

Constitutional Law Center for Muslims in America*

100 N. Central Expy, Suite 1010

Richardson, Texas 75080

Telephone: 972-915-2507

Counsel for Defendant AJP Educational Foundation, Inc.

**The Constitutional Law Center for Muslims in America is
the legal division of the Muslim Legal Fund of America.*

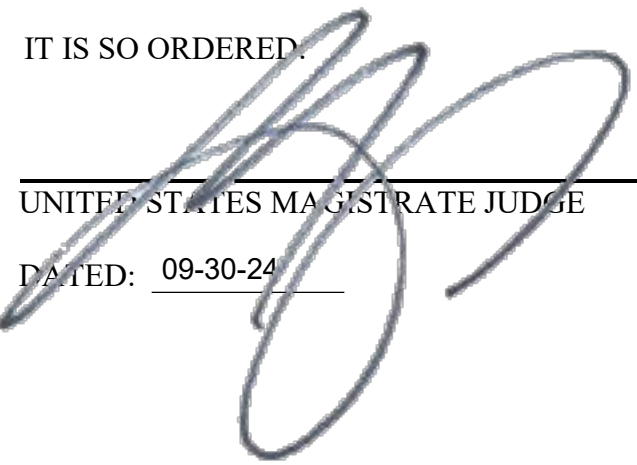
ORDER

Defendant AMP shall have up to and including October 8, 2024, to file a responsive pleading in this matter.

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 09-30-24

A large, stylized handwritten signature in blue ink, written over the signature line and extending upwards into the 'IT IS SO ORDERED' area.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of September 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Leo S. Wolpert
Employee of McLetchie Law